

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LEONARD C. JEFFERSON,)
)
Plaintiff,)
)
v.) C.A. No. 04-44 E
)
WILLIAM WOLFE, ET AL.,)
)
Defendants.)

**DEFENDANTS' AMENDED RESPONSE TO PLAINTIFF'S
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS**

12. There was no misconduct report written, but Glenn McQuown did write an Employee Report of Incident dated October 28, 2002, see attached.

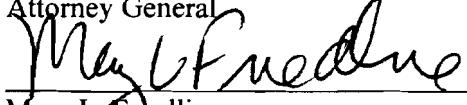
13. See document provided in response to number 12 above.

14. Yes, see document provided in response to number 12 above addressed to Captain Bartlett. There were no reports prepared by this Captain.

Respectfully submitted,

THOMAS W. CORBETT, JR.

Attorney General



Mary L. Friedline

Mary L. Friedline

Senior Deputy Attorney General

Attorney I.D. No. 47046

Susan J. Forney

Chief Deputy Attorney General

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Date: October 16, 2006

10/06/2006 15:38 FAX 8147569733

SCI ALBION

002

DC-121 Part 3 Revised 5/99 Attachment D 8.7.3		Pennsylvania Department of Corrections Employee Report of Incident		<input type="checkbox"/> Use of Force Occurrence
To: <i>Cpt. Bartlett</i>	Title: <i>Shift Commander</i>	Date <i>10/28/06</i>	Time <i>1437</i>	
From (Name Printed) <i>Glen McQuown</i>	Title: <i>FCPD</i>	Location of Incident <i>Chapel offices</i>		
Employee Signature: <i>Glen McQuown</i>		Type of Incident: <i>Inflammatory material</i>		
Inmates Involved (Name and Number)	Staff Involved (Name and Title)	Witnesses		
Jefferson, C. CL-4185	Brannon, Barbara Anderson, Michael	Abdalla, El Hafiz		
CONFIDENTIAL EYES ONLY OF ADDRESSEE NOT FOR DISTRIBUTION PROPERLY SECURE THIS DOCUMENT				
<p>1. Detailed description of the occurrence.</p> <p>Minister Anderson requested Clerk Brannon make a copy of the attached document. While no attempt has been made to disseminate this material, it is of an inflammatory nature. Inmate Jefferson reports to Imam Abdalla that he was reading the document when Minister Anderson requested him to read it and then gained permission to material to copy. Inmate Jefferson was informed that the material was inappropriate - the poetry portion - and that it is NOT to be distributed.</p> <p>OCT 29 2006</p> <p><i>cc: Mr. Bartlett</i></p> <p style="text-align: right;">02 DEC 28 P.M. 4 18 SCI ALBION</p>				

003

Nest 2 - Dood
were coming on
back side of cliff

הוּא הַמְלָאֵקָה הַמְבָרֶךָ וְהַמִּתְּמֻנָּה

The study compared the number of minutes spent in static positions with the number of minutes spent in active postures. Results showed that people who sat for longer periods of time had higher levels of sedentary behaviour than those who sat for shorter periods of time. This suggests that sitting for long periods of time may contribute to the development of chronic diseases such as obesity, diabetes, and heart disease.

STUDY PAGE C.1

Prebate said: "The thing we're talking about is the past 30 or 40 years. The contributions gradually go up as inflation goes up. I think it's reasonable to take a look at each of the pension plans and the numbers of blocks in each to see if there's a mismatch between the money coming in and the money going out." He added: "I think we have been somewhat lucky in the last few years, a number of the high rate blocks in the pension fund have been eliminated so we don't have to contribute as much to those blocks as we did before."

process. Until remuneration rates of individual workers and groups of workers are established and agreed upon by individual workers or the collective labour contract, wages will fluctuate until the remuneration rates of individual workers are established by individual workers.

If you assess that your relatives lack up higher than their predecessors at the same time, it may be that the more circumstances, "now and under normal conditions, that affect the same relatives" are the same as those which affected their predecessors. Likewise, because relatives like us can usually pass on traits to their offspring, we can usually predict what traits will be passed on to our children. This is called heredity.

10004

21ST CENTURY'S DAWN'S EARLY LIGHT

My Country tis of thee
This is about your reality
By the 21st Century's Dawn's early light
There ain't no justice for you here if you ain't white

Sweet land of liberty
Bitter was the taste of your slavery
And that pitiful taste remains strong in all of our mouths
As we now see you lynching us downtown in your courthouses

The whole world watched you beat down Rodney King
Then we saw white jurors who could not see what we were seeing
With their open eyes their closed minds saw the police were right
You know there ain't no justice for you here if you ain't white

Today's lynchings are performed at Police State-style trials
Perpetuating this injustice American-style
Highlighting the unstated semantic reality
That lynchings don't require bodies hanging from the trees

Oh say can you see
Strange fruit no longer hangs in America's trees
Now in the land of the free the home of the brave
Prisons conceal the lynched children of America's slaves

Remember Martin told us to let Freedom ring
So my Country tis of thee that I sing
Now in the land of the free the home of the brave
Prisons conceal the lynched children of America's slaves

10/06/2006 15:40 FAX 8147569733

SCI ALBION

005

SELF-HEALING

Practiced before man began recording history
 The art of self-healing ain't no real mystery
 The best doctors with perfected visions in their minds
 Can't help those who're determined to remain blind

Those who go out of their way to trivialize
 Their lost of focus upon a very important prize
 Living a nightmare unaware running out of time
 Oblivious victims of State-sponsored hate crimes

380
100

The only thing missing in their courtrooms is their hanging tree
 And justice for people with black skin like you and me
 Courts remain one of America's most racist places
 Please don't try to deny it when its
 right up in all of our faces

One hundred and seventeen per one hundred thousand
 is White folk's incarceration rate
 One thousand six hundred and seventy-three per hundred thousand
 is Black's rate in this racist state
 Doubt has been dispelled by computerized light
 Black's incarceration rate is fourteen times that of Whites

Native
Gazette

Social scientist produce these stats then they tell you humongous lies
 Which you'll accept as true if you're determined to remain blind
 Will you act upon the facts upon which these stats stand
 To end State-sponsored hate crimes against the Black man

Even blind eyes must see our apathy as being beyond strange
 Educated and wealthy now what are we doing to make this situation change
 Could it be that doctorate degrees and surplus personal wealth
 Destroy the vision of those who have not learnt
 we must show love to ourselves

Practiced before man began recording history
 The art of self-healing ain't no real mystery
 The best doctors with perfected visions in their minds
 Can't help those who're determined to remain blind

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing
*Defendants' Amended Response to Plaintiff's Interrogatories and Request for Production of
Documents* was served upon the following, by first-class mail this October 16, 2006.

Leonard C. Jefferson, CL-4135
State Correctional Institution
At Albion
10745 Route 18
Albion, PA 16475



Mary L. Friedline
Senior Deputy Attorney General